



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 7, 2020

VIA ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Calvin Dubose*, 19 Cr. 841 (RMB)

Dear Judge Berman:

Earlier today, the Court held a status conference in the above-captioned case where the parties' respective positions were communicated to Court. This included the status of ongoing discussions toward a pretrial resolution. Because these discussions are ongoing, the Court scheduled a case conference for June 18, 2020 to allow the parties additional time to attempt to resolve this matter without the need for a trial. The Government writes, with the consent of defense counsel, to respectfully move the Court to exclude the time between today, May 7, 2020 and June 18, 2020, from the provisions of the Speedy Trial Act to allow the parties' discussions to continue. The parties respectfully submit that the need for exclusion and the ends of justice outweigh the interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Application granted for the reasons set forth
in this letter.

SO ORDERED:
Date: 5/11/2020

Richard M. Berman
Richard M. Berman, U.S.D.J.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

Dominic A. Gentile

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cc: Edward V. Sapone, Esq. (Via ECF)
Chase Ruddy, Esq. (Via ECF)